

LOS ANGELES HARBOR BACTERIA TMDL (INNER CABRILLO BEACH AND MAINSHIP CHANNEL)

	Commentor	Question & Comments	Response
1	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • What are the monitoring points? 	<ul style="list-style-type: none"> • HW07 in the main Ship Channel, CB1, and CB2 on Cabrillo Beach
2	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Is the Marina and the other areas north of the swimming Beach described in the Staff Report included in the planned sampling for the Inner Harbor? 	<ul style="list-style-type: none"> • No. We’re including all Inner Harbor upper stream of the Main Ship Channel in our current bacteria survey. The Port of LA is collecting some bacterial data in this area and the Implementation Plan will require a study of the area.
3	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Is this beach (Cabrillo) comparable with the selected reference beach? 	<ul style="list-style-type: none"> • In many ways – it is a marine beach with a fresh water source - but this is a closed beach. Reference beach is an open beach associated with largely undeveloped subwatershed.
4	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Does reference beach have birds like Cabrillo Beach? 	<ul style="list-style-type: none"> • [Linda Chilton of Marine Aquarium replies: yes, several areas with heavy bird usage on reference beach.]
5	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Are we encouraging animals and birds to congregate at enclosed beach? How was water circulation at Inner Cabrillo Beach compared to the selected reference beach? 	<ul style="list-style-type: none"> • Reference beach should be one with similar conditions as this beach but which does not have much anthropogenic impact. Water circulation is different at this beach than reference beach (Port of Los Angeles and the U.S. Army Corps of Engineer are conducting circulation studies). We want better reference beaches but we don’t think we have them at this point.

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6	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Why does it take so long to clean the beach? 	<ul style="list-style-type: none"> • Note taken. We're doing our best to make it happen. The implementation plan will require certain period of time to complete necessary studies which also need funding from responsible parties
7	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Are REC-1 designated beneficial uses applied to all? 	<ul style="list-style-type: none"> • Yes
8	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • How does potential REC-1 apply (Main Ship Channel is Potential Rec-1) 	<ul style="list-style-type: none"> • Potential beneficial uses shall be protected as required however there are opportunities to adjust the standard
9	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • For wet weather exceedances should consider influences from storm drain and run-off. 	<ul style="list-style-type: none"> • Note taken
10	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Specific day for comments on this draft TMDL Staff Report 	<ul style="list-style-type: none"> • It will be March 31, 2004 in order to be included in the next generated draft
11	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Consider broken storm drain and old sewer lines as potential sources 	<ul style="list-style-type: none"> • Note taken
12	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Warning signs for not throwing trash into the storm drain and the ocean 	<ul style="list-style-type: none"> • Note taken
13	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • A lot of information from Inner Cabrillo Beach Water Quality Improvement Project are included in the draft Staff Report 	<ul style="list-style-type: none"> • Yes
14	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Reference beach is not enclosed beach 	<ul style="list-style-type: none"> • Note taken. Special study for reference beach can be included in the implementation plan. At the 4 year point, we plan to re-consider reference beach approach and which reference beach

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15	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Found that bird exclusion was included in the draft TMDL Staff Report. The purpose of this TMDL is not to clean up natural sources. Who will be responsible for the birds? 	<ul style="list-style-type: none"> • Note taken. We do address the effectiveness of the bird exclusion structure in reducing bacterial in this TMDL. Birds might not be completely natural source as we attract with usage (trash)
16	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Will municipalities other than City of Los Angeles be included in implementation plan – don't want to see a last minute change. 	<ul style="list-style-type: none"> • Response at meeting : Not planning to include others at this time. [Further examination of storm drains in Inner Harbor has lead to decision to include County of Los Angeles for the MSC]
17	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Dominguez Channel dischargers should be included as responsible parties 	<ul style="list-style-type: none"> • Note taken. TMDLs are planned for Dominguez Channel 303d listed pollutants including bacteria.
18	<ul style="list-style-type: none"> • Comment made during 11 March 04 meeting 	<ul style="list-style-type: none"> • Consider different target dates for HW07, CB1, and CB2 because number of exceedances are very different at those sites. 	<ul style="list-style-type: none"> • Will be considered
19	<ul style="list-style-type: none"> • City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> • Leo Carillo Beach is an inappropriate reference for Los Angeles Harbor so when reference is reconsidered at 4 –year re-opener, include assessment of size of reference system, rainfall, variability, and consider 'Natural Sources Exclusion' 	<ul style="list-style-type: none"> • We will work with stakeholders and consider each of these options at the time of the 4-year re-consideration.
20	<ul style="list-style-type: none"> • City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> • Clarify Beneficial Uses section – Main Ship Channel is listed as part of Los Angeles River Estuary 	<ul style="list-style-type: none"> • Beneficial Uses section has been corrected, Main Ship Channel is part of Los Angeles Harbor
21	<ul style="list-style-type: none"> • City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> • Inner Cabrillo Beach and Main Ship Channel are two very different areas, each area should be discussed separately. 	<ul style="list-style-type: none"> • As draft is modified and updated we will keep the discussions of the two areas separate when appropriate, to minimize confusion.

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22	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> Because REC-1 type activities are strictly prohibited in the Main Ship Channel use REC-2 objectives. 	<ul style="list-style-type: none"> REC-1 is a potential use in the Main Ship Channel and therefor must be protected as such.
23	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> Shellfish harvesting is listed as E in Main Ship Channel and should be P. Additionally, a Use Attainability Analysis (UAA) should be conducted to determine if Shellfish Harvesting is appropriate. 	<ul style="list-style-type: none"> Shellfish Harvesting should have been listed as P and that has been corrected.
24	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> The inclusion of legacy pollutants and metals in this TMDL is inappropriate. 	<ul style="list-style-type: none"> The legacy pollutants and metals are only mentioned in the description of the environmental setting as other contaminants for which there are 303 (d) listings and are not addressed in this TMDL.
25	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> An opening in the breakwater could have many deleterious impacts; a breakwater modification should be fully investigated prior to implementation. 	<ul style="list-style-type: none"> We agree, any modification to the breakwater will have to be thoroughly investigated before it can be considered. The implementation plan requires that ‘permanent’ solutions (such as breakwater modification) be considered after ‘best management practices’ type improvements have been implemented and shown to be inadequate.
26	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> City of Los Angeles is the only responsible party under this TMDL but other agencies in Dominguez watershed may be contributing 	<ul style="list-style-type: none"> City of Los Angeles is the agency listed for ICB. Both the City and County of Los Angeles are listed for the MSC.
27	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> The City of Los Angeles, Bureau of Sanitation is specifically listed as the monitoring agency – list as City of Los Angeles 	<ul style="list-style-type: none"> Agreed.

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28	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> TMDL is described as Marina Del Rey TMDL 	<ul style="list-style-type: none"> This mistake has been corrected.
29	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> “On 7 July, 2000 City of Los Angeles directed the Environmental Affairs Division, Recreation and Parks, Harbor Department, and EMD to conduct.....” should read “ on 7 July, 2000 the City of Los Angeles conducted.....”. 	<ul style="list-style-type: none"> Agreed.
30	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation, email, 3/31/04 	<ul style="list-style-type: none"> City of Los Angeles, Bureau of Sanitation requests time to investigate natural sources of bacteria at beach besides birds. 	<ul style="list-style-type: none"> We welcome additional information on the relative impacts of different natural sources of bacteria but cannot delay development of this TMDL.
31	<ul style="list-style-type: none"> Cabrillo Marine Aquarium, email, 3/31/04 	<ul style="list-style-type: none"> Cabrillo Marine Aquarium offers much additional information on uses of Cabrillo Beach and on the local marine habitat. 	<ul style="list-style-type: none"> The TMDL will be updated to include this information.
32	<ul style="list-style-type: none"> Cabrillo Marine Aquarium, email, 3/31/04 	<ul style="list-style-type: none"> Bird excluders have not conclusively improved water quality and should be removed to allow wildlife to co-exist with beach use by humans. 	<ul style="list-style-type: none"> We disagree, bird excluders have made a significant difference in the number of exceedances at Inner Cabrillo Beach. However, the wildlife uses of the beach are important and may preclude consideration of expansion of bird excluders.
33	<ul style="list-style-type: none"> Cabrillo Marine Aquarium, email, 3/31/04 	<ul style="list-style-type: none"> Trash and debris on beach continues to be a problem 	<ul style="list-style-type: none"> Trash will be addressed by BMP early in the implementation plan.
34	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, 3/30/04 	<ul style="list-style-type: none"> We agree with decision not to include County of Los Angeles as a responsible party. 	<ul style="list-style-type: none"> The County of Los Angeles has been included as a responsible party for the Inner Harbor, Main Ship Channel.

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35	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, 3/30/04 	<ul style="list-style-type: none"> Leo Carillo Beach is an inappropriate reference beach due to circulation differences. 	<ul style="list-style-type: none"> We agree that the chief disadvantage of Leo Carillo Beach as a reference is the difference in circulation but we believe Leo Carillo to be the best reference beach for which data is available at this time.
36	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, 3/30/04 	<ul style="list-style-type: none"> Wildlife is a natural source of bacteria to the Los Angeles Harbor and as wildlife bacterial contributions have not been fully determined, may not be fully represented by the reference watershed. 	<ul style="list-style-type: none"> Precise studies equating wildlife uses of Leo Carillo Beach and Inner Cabrillo Beach have not been conducted, but both areas are heavily used by wildlife and in this respect, Leo Carillo Beach is an appropriate reference for Inner Cabrillo Beach.
37	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> The implementation schedule requires MSC to be in compliance within 3 years for summer and winter dry limits which is unreasonable short period of time for MS4s and others point sources. Santa Monica TMDL was that short because some of the work had already begun. 	<ul style="list-style-type: none"> Note taken. The period was first set to be consistent with previous TMDLs. In this TMDL, now extended to 5 years.
38	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> 30-day geometric mean is not preferred. A few days of high single sample exceedance can cause exceedances of many following days – not necessarily evidence of a chronic problem 	<ul style="list-style-type: none"> The proposed 30-days geometric mean allocations (zero days of exceedance) is consistent with other bacteria TMDLs. Regional Board will look at this issue as the TMDL is re-evaluated.
39	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> How will MS4s be enforced? Will daily monitoring be required for a period of time and be off after compliance? 	<ul style="list-style-type: none"> Waste Discharge Requirement will be issued and monitoring requirements will be specified in the permit

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40	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> When was Main Ship Channel specified in the Basin Plan as REC-1? What does it mean when beneficial use is listed as potential? Does it mean that the specified water body will not be addressed by TMDL? Would it be revised? 	<ul style="list-style-type: none"> REC-1 was set for MSC since 1975 Potential beneficial use were only used some time for MUN but not REC-1 This issue will be address as special study in the implementation plan
41	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Dominguez Channel might be a major source of bacteria to Inner Harbor and Main Ship Channel. 	<ul style="list-style-type: none"> Survey of bacteria in Dominguez Channel shows much lower levels of bacteria near mouth of Channel indicating probably not a high source – but survey small
42	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> How would the days of exceedance be changed if needed 	<ul style="list-style-type: none"> Assuming the question pertains to the number of exceedance days allowed by the reference beach approach, it would be changed through a Basin Plan Amendment that amends the TMDL.
43	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Need a map showing storm drains and drainage areas going to Main Ship Channel and Cabrillo Beach 	<ul style="list-style-type: none"> Area maps to be included with Staff Report. We will look at developing drainage area maps.
44	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Contribution from Dominguez Channel should be considered and addressed in the Staff Report as it was done the same for Santa Monica Bay Beaches Bacteria TMDL with respect to impact from Malibu Creek and Ballona Creek 	<ul style="list-style-type: none"> We know that Dominguez Channel is source of water coming to Main Ship Channel but don't know how large a source of bacteria it is. Survey of bacteria in Dominguez Channel shows much lower levels of bacteria near mouth of Channel indicating perhaps not a high source – but survey small. The Special Study of the Inner Harbor required in Implementation Plan will add additional information.

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45	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Los Angeles River Nutrient TMDL require MS4s permittee to monitor for Nitrate, nitrite, and ammonia, will MS4s permit require monitoring for bacteria as the TMDL is in effect? 	<ul style="list-style-type: none"> Point Taken
46	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> What will be included in cost section 	<ul style="list-style-type: none"> Cost analysis section will include the estimated capital costs of diverting 10 major storm drains (approx number with dry weather flow) and the operation and maintenance (O&M). It also include the cost for addition BMP and upgrading existing sewer line.
47	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Compare the implementation schedule for Santa Monica Bay Bacteria TMDL and this TMDL, the time line for dry weather compliance is longer (6 years instead of 3 years). Recommend to have 6 years for both since the City of Los Angeles need time for planning and processing. 	<ul style="list-style-type: none"> Note taken. Changed to 5 years. See revised BPA
48	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Integrated water resources approach should be considered as it was in the Santa Monica Bay Beaches Bacteria TMDL for wet-weather which had given responsible agencies 18 years to implement. 	<ul style="list-style-type: none"> Wet weather targets are already being met in the main Ship Channel so no reduction in exceedance days is necessary and the Integrated Water Resources approach is not necessary.
49	<ul style="list-style-type: none"> Comments made during April 22, 2004 meeting 	<ul style="list-style-type: none"> Santa Monica Bay Bacteria will be reconsidered in 4 years to look at reference beach and other issues, will Los Angeles Harbor bacteria TMDL will be considered at the same time? 	<ul style="list-style-type: none"> Yes. Please see Tentative Resolution, Table 7-11.3

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50	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works (The County), April 27, 2004 	<ul style="list-style-type: none"> The County recommends that the TMDL clearly define the term “responsible agency” as was done in the Santa Monica Bay Beaches Bacteria TMDL. The Los Angeles County has been added as responsible agency because it owns several storm drains discharging to the Inner Harbor 	<ul style="list-style-type: none"> Note taken. See Tentative Resolution, Table 7-11.1
51	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, April 27, 2004 	<ul style="list-style-type: none"> Staff Report should include a map clearly showing the 303(d) listed water bodies, namely Inner Cabrillo Beach and the Main Ship Channel that are subject of the proposed TMDL. The map should also clearly delineate the drainage are tributary to these water bodies, and identify the Inner harbor areas. 	<ul style="list-style-type: none"> Note taken. See Draft Staff Report
52	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, April 27, 2004 	<ul style="list-style-type: none"> A linkage analysis should be done for the Main Ship Channel 	<ul style="list-style-type: none"> Note taken. See Draft Staff Report
53	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, April 27, 2004 	<ul style="list-style-type: none"> Public Works requests that water quality data collected by MEC Analytical Systems between 2002 and 2004 and other available water quality data be made available for public review. 	<ul style="list-style-type: none"> The data will be posted on Regional Board web site under TMDL section as appendices

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54	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, April 27, 2004 	<ul style="list-style-type: none"> Any potential impact from Dominguez Channel should be addressed in the Staff Report. A similar situation arose for the Santa Monica Bay Beaches Bacteria TMDL with respect to impact from Malibu Creek and Ballona Creek. See enclosed letter dated October 28, 2003 from Denis Dickerson. 	<ul style="list-style-type: none"> Dominguez Channel is source of water to Main Ship Channel but probably not a large source of bacteria. Survey of bacteria in Dominguez Channel shows much lower levels of bacteria near mouth of Channel indicating perhaps not a high source – but survey small. The Special Study of the Inner Harbor required in Implementation Plan will add additional information.
55	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, April 27, 2004 	<ul style="list-style-type: none"> The proposed compliance timeline for summer and winter dry-weather should be changed to six years as was originally proposed for the Santa Monica Bay Beaches Bacteria TMDL for dry-weather. For that TMDL, the summer dry-weather compliance deadline was reduced from six to three years because some low-flow storm drain diversion projects were already in progress as that TMDL was being developed. Such is not the case of this TMDL. Responsible agencies will need six years to plan, design, and construct new low-flow diversions 	<ul style="list-style-type: none"> The compliance timeline is changed from three years to five years. See tentative Resolution

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56	<ul style="list-style-type: none"> County of Los Angeles, Department of Public Works, April 27, 2004 	<ul style="list-style-type: none"> Public Works recommends that the responsible agencies be given the option to pursue an ‘integrated water resources’ approach (as was defined in the Santa Monica Bay Beaches Bacteria TMDL for wet-weather) to address the wet-weather problem. Should responsible agencies option for the integrated solution, up to 18 years should be allowed to implement the solution. 	<ul style="list-style-type: none"> Wet weather targets are already being met in the main Ship Channel so no reduction in exceedance days is necessary and the Integrated Water Resources approach is not necessary.
57	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation (BOS), email, 4/28/04 	<ul style="list-style-type: none"> Beneficial Use designations for the Los Angeles Harbor Main Ship Channel should be evaluated through a UAA to determine whether REC-1 and SHELL designations are appropriate with its usage 	<ul style="list-style-type: none"> Special studies will be required for MSC to include an analysis of the feasibility of conducting a UAA for the REC-1 and SHELL uses. See Basin Plan Amendment
58	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> Sentence states that the TMDL implementation plan requires stakeholders to estimate the bacteria loading resulting from birds. Please add “. and other natural, non-anthropogenic sources.” to the end of the sentence. 	<ul style="list-style-type: none"> Note taken. See Staff Report
59	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> Include the Los Angeles Harbor Main Ship Channel (MSC) with the Dominguez Channel Bacteria TMDL. The bacteria load that the MSC receives from the Dominguez Channel is unknown at this time and may be a significant contributor to bacterial exceedances within the MSC. 	<p>Although an argument can be made to combine the Main Ship Channel and Dominguez Channel, the Main Ship Channel and Cabrillo Beach, both part of the Los Angeles Harbor, are combined in the Consent Decree schedule. The contribution of bacteria from Dominguez Channel to the Los Angeles Harbor is probably small.</p>

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60	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> As stated on Pg 24 there is limited data to determine bacterial exceedances for the potential shellfish designation. Due to this lack of data, additional information needs to be obtained to appropriately characterize the potential SHELL designation impairment. The RWQCB may consider utilizing existing REC-1 for MSC bacteria standards until further data is obtained for SHELL impairment. 	<ul style="list-style-type: none"> Special studies will be required for MSC to include an analysis of the feasibility of conducting a UAA for the REC-1 and SHELL uses. See Basin Plan Amendment
61	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> The City of Los Angeles, Harbor Department has proposed BMPs and is in the process of implementing the activities as outlined in Table 9.1 Therefore, the Harbor Department should be listed as the responsible party for the City of Los Angeles in Table 9.1. 	<ul style="list-style-type: none"> It is preferable to allow the City of Los Angeles flexibility as to precisely what departments in the City take the required actions. Previously, BOS has asked for Departments not to be listed specifically (see Comment 27).
62	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> As stated in Section 4.1.1, the Terminal Island Treatment Plant “is not a significant source of bacteria to the Beach or to the Ship Channel.” The monitoring requirements under the TITP Permit for bacteria would, therefore, be appropriate under the MS4 Permit. RWQCB should move the bacteria monitoring requirement from the TITP Permit at its next renewal to the municipal stormwater permit. 	<ul style="list-style-type: none"> This matter should be addressed as the TITP permit is renewed.

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63	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> The cost analysis and storm drain diversions refer to “diverting the remaining 10” major storm drains to a POTW. BOS is not aware of diversions that have already been completed by the Harbor Department and that 10 additional drains have been identified by the Harbor for diversion. 	<ul style="list-style-type: none"> The number 10 is the approximate number of storm drains in the Inner Harbor with dry weather flow. The Staff Report has been re-written to be more clear.
64	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> Sentence states “. notable recreational and aqyatuc abd wildlife habitat...” Please clarify. 	<ul style="list-style-type: none"> Typo corrected.
65	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> Extra period at the end of the paragraph. 	<ul style="list-style-type: none"> Typo corrected.
66	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> Sentence states “. just north of the Cabrillo Beach each is the Cabrillo Marina,...” Please clarify. 	<ul style="list-style-type: none"> Typo corrected.
67	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> Sentence states “. impervious, with drainage is primarily through the storm drain system...” Please clarify 	<ul style="list-style-type: none"> Typo corrected.
68	<ul style="list-style-type: none"> The City of Los Angeles - Bureau of Sanitation, email, 4/28/04 	<ul style="list-style-type: none"> The paragraph states that the Water Quality Objectives in the California Ocean Plan for the density of total coliform is less than 1,000 per 200 ml. BOS believes that the correct amount for the standard is 1,000 per 100 ml. Please clarify. 	<ul style="list-style-type: none"> Typo corrected.

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69	<ul style="list-style-type: none">The City of Los Angeles - Bureau of Sanitation, email, 4/28/04	<ul style="list-style-type: none">Sentence states "...feral cat population is fed by local residnets..." Spelling correction from residnets to residents.	Typo corrected.
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